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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-YGR

**DECLARATION OF STEPHEN A.  
BROOME IN SUPPORT OF GOOGLE  
LLC'S OPPOSITION TO PLAINTIFFS'  
MOTION FOR LEAVE TO AMEND  
COMPLAINT**

The Honorable Yvonne Gonzalez Rogers  
Courtroom 1 – 4th Floor  
Date: March 15, 2022  
Time: 2:00 p.m.  
Amended Complaint Filed: April 15, 2021

Trial Date: None Set

1 I, Stephen A. Broome, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit  
4 this declaration in support of Google’s Opposition to Plaintiffs’ Motion for Leave to Amend  
5 Complaint. I make this declaration of my own personal, firsthand knowledge, and if called and  
6 sworn as a witness, I could and would testify competently thereto.

7 2. Google has produced more than 6.8 million pages of documents from 43 custodians,  
8 and a dozen Google employees have sat for depositions. Numerous additional Googlers are set to  
9 be deposed in the coming weeks, in addition to the Googlers who will be put up for 30(b)(6)  
10 depositions.

11 3. Attached hereto as **Exhibit 1** is a true and correct copy of Google’s Responses and  
12 Objections to Plaintiffs’ Interrogatories (Nos. 1-3), served on February 5, 2021.

13 4. Attached hereto as **Exhibit 2** is a true and correct copy of a May 23, 2021 letter sent  
14 from Google to Plaintiffs.

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript  
16 of the June 2, 2021 hearing before Magistrate Judge Van Keulen.

17 6. Attached hereto as **Exhibit 4** is a true and correct copy of Google’s Responses and  
18 Objections to Plaintiffs’ Notice of Rule 30(b)(6) Deposition, served on June 11, 2021.

19 7. Attached hereto as **Exhibit 5** is a true and correct copy of Google’s Objections and  
20 Responses to Plaintiffs’ Interrogatories Set 9 (Nos. 34-30), served on January 28, 2022.

21 8. Attached hereto as **Exhibit 6** is a true and correct copy of a February 1, 2022 email  
22 sent from Plaintiffs to Google.

23 9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript  
24 of the February 11, 2021 Case Management Conference.

25 10. Attached hereto as **Exhibit 8** is a true and correct copy of a February 16, 2022 email  
26 sent from Plaintiffs to Google.

27 11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the rough  
28 transcript of the February 18, 2022 deposition of Rory McClelland.

